



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

TENNESSEE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED  
PEOPLE, et al.,

Plaintiffs,

v.

WILLIAM LEE, et al.,

Defendants

No. 3:20-cv-01039

Class Action

Judge Campbell

Magistrate Judge Frensley

**MOTION FOR LEAVE TO FILE SUR-REPLY IN OPPOSITION TO DEFENDANTS’  
MOTION TO STAY PROCEEDINGS PENDING APPLICATION FOR  
INTERLOCUTORY APPEAL**

Plaintiffs respectfully move this Court for leave to file a sur-reply to address Defendants’ assertion that now that discovery is complete, “it is evident that the six named individual Plaintiffs do not have standing to bring their claims in this case.” Defs. Rply., ECF 136, at 4. But these claims continue to rely upon Defendants’ incorrect assertion—already properly rejected by the Court—that standing is dependent on Plaintiffs’ ultimate eligibility for voting rights restoration rather than the procedural injuries alleged.

Plaintiffs assert that a sur-reply is necessary to provide the Court with a complete and accurate picture of the status of the case and the relief being sought by Plaintiffs. The proposed sur-reply is attached hereto as **Exhibit A**.<sup>1</sup>

<sup>1</sup> Counsel for Plaintiffs emailed counsel for Defendants to inquire whether the instant motion is opposed. Defendants responded that they take no position.